

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 23-bk-02771-HWV
PENN CENTER HARRISBURG, L.P. :
Debtor : Chapter 11
:

**DEBTOR'S MOTION FOR EMERGENCY AND EXPEDITED HEARING
REGARDING: (i) DEBTOR'S MOTION FOR APPROVAL TO UTILIZE CASH
COLLATERAL; (ii) DEBTOR'S MOTION FOR ENTRY OF INTERIM AND FINAL
ORDER PROVIDING FOR ADEQUATE ASSURANCE OF PAYMENT FOR FUTURE
UTILITY SERVICES; AND (iii) DEBTOR'S MOTION FOR APPROVAL FOR DEBTOR
TO PAY PRE-PETITION PAYROLL**

The Debtor's Motion for Emergency and Expedited Hearing regarding Motion for (i) Approval to Utilize Cash Collateral; (ii) Motion for Entry of Interim and Final Order Providing for Adequate Assurance of Payment for Future Utility Services (the "Utilities Motion"); and (iii) Motion for Approval to Pay Pre-Petition Payroll (the "Payroll Motion"), is as follows:

1. On December 7, 2023, the Debtor filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code. As a result thereof, the Debtor has been appointed as a Debtor-in-Possession and operates its business and manages its assets.

2. The Debtor is a Pennsylvania limited partnership engaged in the ownership and management of commercial real estate (the "Business").

3. In order to continue its Business, the Debtor has a need to utilize its accounts receivables and cash and pay its expenses of operation. As a result, the Debtor has filed the Cash Collateral Motion.

4. In order to allow the Debtor to continue to operate, the Debtor requests that the hearing on the Cash Collateral Motion be held on an expedited and emergency basis. A true and correct copy of the Cash Collateral Motion is attached hereto as Exhibit "A".

5. The Debtor operates its Business. The operations will be harmed by the termination of utility services.

6. Thus, the Debtor has filed the Utilities Motion. It is also requested that the Utilities Motion be heard on an emergency and expedited basis so that the Debtor does not lose utility services. A true and correct copy of the Utilities Motion is attached hereto as Exhibit "B".

7. The Debtor has employees which it needs to utilize in order to continue to provide services to its customers and generate receivables. As a result, the Debtor has filed the Payroll Motion. A true and correct copy of the Payroll Motion is attached hereto as Exhibit "C". It is also requested that the Payroll Motion be heard on an emergency and expedited basis so that the Debtor does not lose its employees.

8. For the above reasons, the Debtor requests that the Court schedule a hearing on the Cash Collateral Motion, Utilities Motion and Payroll Motion at the earliest possible moment.

WHEREFORE, the Debtor respectfully requests that this Honorable Court schedule a hearing on the Debtor's Motion for Approval to Utilize Cash Collateral, Motion for an Interim and Final Order providing for Adequate Assurance of Payment of Future Utility Services and the Debtor's Motion for Approval to Pay Pre-Petition Payroll at the earliest possible moment.

Respectfully submitted:

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& WARSHAWSKY, P.C.

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Date: December 7, 2023